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Attorney for Plaintiffs

UNITED STATE DISTRICT COURT
FOR DISTRICT OF NORTHERN CALIFORNIA

BAO YI YANG, WEI WANG, AND LIANG
XIAN FU

Plaintiffs,

vs.

SHANGHAI GOURMET, LLC, dba
SHANGHAI GOURMET, and DOES 1-10

Defendants

Case No.: C07-4482 JL

**DECLARATION OF ADAM WANG IN
SUPPORT OF MOTION FOR LEAVE TO
FILE A FIRST AMENDED COMPLAINT**

Date: July 2, 2007
Time: 9:30 AM
Judge : Honorable James Larson
Trial Date: None

I, the undersigned, declare as follows:

1. I am duly licensed to practice law in the State of California, am the attorney of record for Plaintiffs in this case. I have personal knowledge of the facts stated herein and, if called upon to testify before this court, I could and would testify competently to the following facts.

2. On May 2, 2008, by registered mail with return receipt requested, I sent both California Labor and Workforce Development Agency and Defendants a letter alleging various Labor Code violations by Defendants, and indicating Plaintiffs' intension to recover unpaid wage and appropriate penalties authorized under Labor Code § 558 on behalf all former and current employees pursuant to Private Attorney General's Act, Labor Code § 2699, *et seq.* Exhibit 1 hereto is a true and accurate copy of such a letter.

DECLARATION OF ADAM WANG IN SUPPORT OF
MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT
Yang v. Shanghai Gourmet LLC, et al.

1 3. While parties submitted a Joint Case Management Statement agreeing to a fact
2 discovery cutoff on September 3, 2008 (Docket #7), and the Court adopted parties' Joint Case
3 Management Statement in its Minutes (Docket #18), the Court has not set a trial date and date for
4 pre-trial conference in this case.

5 4. To date, no depositions have been taken; and parties have taken only preliminary
6 discoveries to facilitate mediation.

7 I do declare under penalty of perjury under the laws of the United States that the
8 foregoing is true and correct.

9
10 Date: May 16, 2008

By: /s/ Adam Wang
Attorney for Plaintiffs